

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
Madhuri Trivedi,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 1:19-cv-11862-PBS
v.	)	
	)	
General Electric Company, GE Healthcare,	)	
Larry Culp, GE Board of Directors, Mike	)	
Swinford, Carl Conrath, Fragomen, Del Rey,	)	
Bernsen and Loewy, Jenny Schrager,	)	
	)	
Defendants.	)	
_____	)	

**DEFENDANTS' MOTION FOR LEAVE TO FILE A MEMORANDUM OF UP TO  
TWENTY-FIVE PAGES**

The Defendants, Fragomen, Del Rey, Bernsen and Loewy, and Jenny Schrager (“Fragomen Defendants”) request leave to file a memorandum of up to twenty-five pages in support of their anticipated motion to dismiss the plaintiff’s complaint with prejudice. As grounds for this motion, the Fragomen Defendants state:

1. On August 30, 2019, the plaintiff filed a 188-page complaint accompanied by many pages of exhibits.
2. The Fragomen defendants anticipate filing a motion to dismiss the complaint. Given the many allegations in the plaintiff’s complaint, the Fragomen defendants expect that in order to adequately brief their motion it will require additional pages beyond the 20-page limit set forth in Local Rule 7.1(b)(4).
3. The Fragomen defendants would not oppose the plaintiff’s request for leave to exceed the page limit in any opposition to the motion.

Respectfully submitted,

/s/ Edward V. Colbert, III

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Dated: September 26, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on this September 26, 2019, the foregoing document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to any non-registered participants.

/s/ Edward V. Colbert, III